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April 29, 2025

The Honorable Arun Subramanian
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Khalil et al. v. The Trustees of Columbia Univ. in the City of New York et al.,
No. 25-cv-02079-AS**

Dear Judge Subramanian:

I write as counsel for the Committee on Education and Workforce of the U.S. House of Representatives and its Chairman Tim Walberg (Congressional Defendants) to respectfully request that Congressional Defendants receive a three-week extension of time to respond to Plaintiffs' Second Amended Complaint, from May 2, 2025, to May 23, 2025. Counsel for Plaintiffs, counsel for Columbia University, its Trustees, and Claire Shipman (Columbia Defendants), and counsel for Agency Defendants consent to this request. This is Congressional Defendants' first request for an extension of time. If the Court grants the request, Plaintiffs' reply brief would be due on June 6, 2025. *See Local Civil Rule 6.1(b).*

Earlier today, the Court granted Agency Defendants' motion for a three-week extension, ECF No. 65, resulting in Agency Defendants' motion to dismiss being due on May 23, 2025. However, the Court's order applies only to Agency Defendants, as evident by the clerk adjusting only Agency Defendants' deadlines. This has created a situation where Congressional Defendants and Columbia currently must file their respective motions to dismiss by this Friday, whereas Agency Defendants have until May 23.

Counsel for Columbia Defendants have filed a similar request for a three-week extension of time. *See* ECF No. 66. It would be conducive to the orderly administration of this litigation for the pleading cycle for all Defendants' motions to dismiss to be aligned. This is particularly the case given the inextricable relationship between Plaintiffs' First Amendment claim against Congressional Defendants and their First Amendment claim against Columbia Defendants. Accordingly, Congressional Defendants respectfully request that their response to Plaintiffs' Second Amended Compliant be due on May 23, 2025.

Sincerely,

/s/ Matthew Berry
Matthew Berry
Lead Trial Counsel for Congressional Defendants

The request is GRANTED. The Clerk of Court is directed to terminate the motion at Dkt. 67.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Dated: April 30, 2025